

Steps for Reviewing Direct and Preventative Environmental Benefit Data

This document describes steps for reviewing direct and preventive environmental benefits data. The review uses the following tabs from the "Direct and Preventative Environmental Benefits" report:

1. "Details - Concluded Direct Sums",
2. "by Metric without breaks",
3. "Volume of Oil Spills Prevented",
4. "QA Report # 1", and
5. "QA Report # 2".

Please contact David Sprague at 202-564-4103 or Sprague.David@epa.gov if you have questions or need assistance.

Scheduling Report:

1. Schedule the "Direct and Preventative Environmental Benefits" report located in the ICIS "Federal Enforcement and Compliance Reports / Environmental Benefit QA Reports" folder for the fiscal year and quarter(s) to be reviewed.
 - Enter the same fiscal year and fiscal quarters for the "Settlement Lodged Fiscal Year" and "Settlement Lodged Fiscal Quarter" prompts as for the "Fiscal Year" and "Quarter" prompts.
2. Schedule the report in Excel output format, so you will be able to manipulate the output using Excel. If desired, also schedule the report in Adobe Acrobat format, so you will be able to see the report headers (prompt values, titles, refresh date, etc.).
3. Save the completed Excel (and Adobe Acrobat) versions of the report to your PC, or shared drive.
4. **The remaining steps should be completed using the Excel version of the report.**

Review of Big Direct Cases:

- First, convert all the zeros (currently stored as text) to numerical format. To do this, select all the numeric cells in the "Details - Concluded Direct Sums" worksheet. Near the top left of the selection should be a warning box indicated by an exclamation point in a yellow diamond. Click on the down arrow to the right of the diamond and select: "Convert to Number". See the print screen below. The zeros have now been converted to numbers. This step is necessary so the lists sort properly in the subsequent steps.

| Final Order Date | Final Order Type Code | Estimated Air Pollutants Reduced, Treated, or Eliminated (pounds) | Estimated Water Pollutants Reduced, Treated, or Eliminated (pounds) | Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds) | Hazardous Waste Treated, Minimized, or Properly Disposed of (pounds) | Estimated Contaminated Soil/Debris to be Cleaned Up (cubic yds) | Estimated Contaminated Water/Aquifer to be Cleaned Up (cubic yds) | Stream Miles Restored/Created (Linear Feet) | Wetlands Restored/Created (Acres) | People Protected by Safe Drinking Water Act Enforcement (# of People) | Toxic Material Abated (# Housing Units, Schools, Buildings) | Volume (gallons) of Untreated Discharge Eliminated |
|------------------|-----------------------|---|---|--|--|---|---|---|-----------------------------------|---|---|--|
| 11/19/2013 | | 0 | 2,319 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 12/19/2013 | | | | 09,100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 03/04/2014 | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 0 |
| 01/24/2014 | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 11/25/2013 | | | | 0 | 0 | 0 | 0 | 0 | 0 | 168 | 0 | 0 |
| 11/01/2013 | | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 11/22/2013 | | | | 15,750 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 01/16/2014 | APD | 0 | 274,041 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 12/12/2013 | APD | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Review of Big Direct Cases – Pounds Reduced:

- Copy the “Details - Concluded Direct Sums” worksheet to a new worksheet entitled: “Pounds Reduced” and insert a column after: “Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds)” entitled: “Estimated Pollutants Reduced, Treated, or Eliminated (pounds).”
 - In the new “Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds)” column enter a formula to sum the previous three columns, i.e.:
 - “Estimated Air Pollutants Reduced, Treated, or Eliminated (pounds)” **plus**
 - “Estimated Water Pollutants Reduced, Treated, or Eliminated (pounds)” **plus**
 - “Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds).”
 - In the new “Pounds Reduced” worksheet, insert a row before the Sum row at the bottom of the list. This step is necessary so the sum row will not be included when sorting.
 - Sort the list in descending order by the “Estimated Pollutants Reduced, Treated, or Eliminated (pounds)” column. Finally, if desired, delete the columns that are not needed by selecting the columns, right clicking on your mouse, and selecting: ‘Delete’.
- If you haven’t done so, please send the calculations to Headquarters for cases totaling over 5 million pounds in the “Estimated Pollutants Reduced, Treated, or Eliminated (pounds)” column. To see the individual amounts for these cases, you may review the cases in the “by Metric without breaks” worksheet.

Review of Big Direct Cases – Hazardous Waste:

- Copy the “Details - Concluded Direct Sums” worksheet to a new worksheet entitled: “Hazardous Waste”.
- In the new “Hazardous Waste” worksheet, insert a row before the Sum row at the bottom of the list.

3. Sort the list in descending order by the "Hazardous Waste Treated, Minimized, or Properly Disposed of (pounds)" column. Finally, if desired, delete the columns that are not needed.
- **If you haven't done so, please send the calculations to Headquarters for cases totaling over 5 million pounds in the "Hazardous Waste Treated, Minimized, or Properly Disposed of (pounds)" column. To see the individual amounts for these cases, you may review the cases in the "by Metric without breaks" worksheet.**

Review of Big Direct Cases – VCMA:

1. Copy the "Details - Concluded Direct Sums" worksheet to a new worksheet entitled: "VCMA" and insert a column after: "Estimated Contaminated Water/Aquifer to be Cleaned Up (cubic yds)" entitled: "Total VCMA."
 2. In the new "Total VCMA" column enter a formula to sum the previous two columns, i.e.:
 - "Estimated Contaminated Soil/Debris to be Cleaned Up (cubic yds)" **plus**
 - "Estimated Contaminated Water/Aquifer to be Cleaned Up (cubic yds)".
 3. In this "VCMA" worksheet, insert a row before the Sum row at the bottom of the list.
 4. Sort the list in descending order by the "Total VCMA" column. Finally, if desired, delete the columns that are not needed.
- **If you haven't done so, please send the calculations to Headquarters for cases totaling over 5 million cubic yards in the "Total VCMA" column. To see the individual amounts for these cases, you may review the cases in the "by Metric without breaks" worksheet.**

Review of Big Direct Cases – Volume Untreated:

1. Copy the "Details - Concluded Direct Sums" worksheet to a new worksheet entitled: "Volume Untreated".
 2. In the new "Volume Untreated" worksheet, insert a row before the Sum row at the bottom of the list.
 3. Sort the list in descending order by the "Volume (gallons) of Untreated Discharge Eliminated" column. Finally, if desired, delete the columns that are not needed.
- **If you haven't done so, please send the calculations to Headquarters for cases totaling over 5 million gallons in the "Volume (gallons) of Untreated Discharge Eliminated" column. To see the individual amounts for these cases, you may review the cases in the "by Metric without breaks" worksheet.**

Review of CSO and SSO Cases:

1. Copy the "by Metric without breaks" worksheet to a new worksheet entitled: "CSO - SSO".
2. Filter the list to only include all cases with a CSO or SSO sub-initiative in the Settlement Pollutant Priority column.

3. Review the list and highlight the rows with "Volume (gallons) of Untreated Discharge Eliminated" in the Environmental Benefit Metric column.
 4. Review the list for cases with "Estimated Water Pollutants Reduced, Treated, or Eliminated (pounds)" amounts entered, but no "Volume (gallons) of Untreated Discharge Eliminated" amounts. For these cases, the "Volume (gallons) of Untreated Discharge Eliminated" amounts should be entered.
 5. Review the list again for cases with "Volume (gallons) of Untreated Discharge Eliminated" amounts entered, but no "Estimated Water Pollutants Reduced, Treated, or Eliminated (pounds)" amounts. For these cases, the "Estimated Water Pollutants Reduced, Treated, or Eliminated (pounds)" amounts should be entered.
- Typically, CSO and SSO cases should have multiple amounts in pounds and one amount in gallons. (For "multiple priority" cases that split the outcomes between CSO and SSO there should be two amounts in gallons.)

Review of Air Toxic Cases:

1. Copy the "by Metric without breaks" worksheet to a new worksheet entitled: "Air Toxics."
 2. Filter the list to only include all cases with an Air Toxics sub-initiative in the Settlement Pollutant Priority column.
 3. For each amount, review the pollutant name listed in the Settlement Pollutant Name column.
 4. The "Priority" field on the Complying Action/Inj. Relief screen in ICIS for amounts that are not hazardous air pollutants should be changed to: "OECA Core Program."
- **If you haven't done so, please send the calculations to Headquarters for cases totaling over 200,000 pounds of hazardous air pollutants [settlement pollutant priority = "Air Toxics ...", metric = "Estimated Air Pollutants Reduced, Treated, or Eliminated (pounds)"]. If there are multiple hazardous air pollutant amounts, each of which is less than 200,000, but which sum to greater than 200,000 then the calculations for those cases should also be sent to HQ. The worksheet: "Details - Concluded Air Toxics" can also assist in determining which case calculations need to be sent to headquarters for review.**

Review of Toxic Material/Substance Cases:

1. Copy the "by Metric without breaks" worksheet to a new worksheet entitled: "Toxic Material."
2. Filter the list for cases with "Toxic Material Abated (# Housing Units, Schools, Buildings)" in the Environmental Benefit Metric column.
3. Search the list for cases that have both a complying action amount and a SEP amount. If the SEP amount is already included in the complying action amount, then the complying action amount should be reduced by the SEP amount to avoid double counting.
4. Copy the "by Metric without breaks" worksheet to a new worksheet entitled: "Toxic Substance."

5. Filter the list for cases with "Toxic Substance Contamination Prevented (# of Housing Units, Schools, Buildings)" in the Environmental Benefit Metric column.
6. Search the list for cases for which have both a complying action amount and a SEP amount. If the SEP amount is already included in the complying action amount, then the complying action amount should be reduced by the SEP amount to avoid double counting.

Review of Greenhouse Gas Cases:

1. Copy the "by Metric without breaks" worksheet to a new worksheet entitled: "GHG".
2. Filter the list for cases with "GHG" in the "Settlement Pollutant Name" column.
3. The "Pollutants" field on the Complying Action/Inj. Relief screen in ICIS for these amounts should be changed to: "Carbon dioxide" or "Carbon dioxide equivalent."

Review of "Volume of Oil Spills Prevented (Gallons)" Cases:

1. Only cases that addressed a potential spill, with the amount reported being the facility's oil storage capacity, should be reported for the metric: "Volume of Oil Spills Prevented (Gallons)". These are typically SPCC or FRP enforcement cases. Cases that addressed actual oil spills, with the preventative amount reported being the actual amount spilled, should not be reported for the "Volume of Oil Spills Prevented (Gallons)" metric.
2. Review the "Volume of Oil Spills Prevented" worksheet. Any benefits calculated based on the actual amount spilled from an oil spill should be removed from ICIS. To assist with identifying cases with spill amounts entered, instances of "CWA 311B" are highlighted in red in the Law Section All table underneath each case.

Review of QA Report Tabs:

1. The "QA Report # 1" worksheet shows amounts where the pollutant name is "Hazardous waste" but the environmental benefit metric is: "Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds)." The "Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds)" metric is for reporting hazardous substances or chemical pollutant amounts. "Hazardous waste" amounts should be reported with one of the complying actions with the "HW" prefix so they will be counted in the "Hazardous Waste Treated, Minimized, or Properly Disposed of (pounds)" metric. **As appropriate, please change the complying actions for the amounts on this list to one of the complying actions with the "HW" prefix.**
2. The "QA Report # 2" worksheet shows amounts where the pollutant name is not "Hazardous waste" but the environmental benefit metric is: "Hazardous Waste Treated, Minimized, or Properly Disposed of (pounds)". Amounts reported with one of the "HW" complying actions or in-situ or ex-situ treatment of hazardous waste amounts should have "Hazardous waste" as the pollutant name or should be identified by the specific hazardous waste listed name (for example, F001). Hazardous substances or chemical pollutant amounts should not be reported with one of the "HW" complying actions. **As appropriate, for the amounts on this list, please change pollutant name to "Hazardous waste" or change the complying action, removing the**

“HW” prefix. Amounts for which the “HW” prefix has been removed will be counted in the “Estimated Toxics and Pesticides Reduced, Treated, or Eliminated (pounds)” metric.

Review of No National Metric Cases:

1. Copy the “by Metric without breaks” worksheet to a new worksheet entitled: “No National Metric.”
2. Filter the list for cases with “No National Metric” in the Environmental Benefit Metric column. This list is for your information. The current ICIS filtering does not allow the reporting of an Environmental Benefit Metric for the complying action amounts on this list. For SEP amounts, the Environmental Benefit Metric is not assigned by ICIS, but is assigned by the “Direct and Preventative Environmental Benefits” report. For the SEP amounts on this list the report was unable to assign a metric. If you think a metric should be assigned for any of the SEPs listed, please contact David Sprague at 202-564-4103 or Sprague.David@epa.gov to obtain advice on how to correct the information in ICIS.

Review of Lodged Cases:

1. Finally, please review the amounts in the worksheets: “Lodged without breaks”, “Details - Lodged Direct Sums”, and “Details - Lodged Air Toxics Sum” for accuracy. If necessary, make any corrections in ICIS. **In addition, for large cases please be prepared to send the calculations to Headquarters once each case concludes.**